



Professional design, installation and service of solar energy systems

December 3, 2014

State of New Hampshire, Public Utilities Commission
Elizabeth R. Nixon, Energy Analyst
21 S. Fruit Street, Suite 10
Concord, NH 03301-2429

RE: DE 10-212 Commercial and Industrial Solar Rebate Program Recommended Program Changes

Dear Ms. Nixon,

On behalf of Revision Energy, we thank you for considering the positive staff recommendations to the C&I incentive program. By allowing systems over 100kw's to benefit from the incentive program opens the doors for new and exciting projects in NH such as schools and municipalities exempt from tax credits while growing the renewable energy industry and creating more local jobs.

We would like to share a few comments we ask you to please consider when making modifications to the program. They are as follows:

1. Budget and funding levels: Create a visual chart on the PUC website showing the availability of funds for Category 1 and 2 of the C&I program which is updated daily or at the very least, weekly. (EG: Available, Under Review, Committed)
2. Timeline for adoption: Set an effective date of when the new program will be initiated and applications will be available for use.
3. Application process: Create an efficient electronic application portal and eliminate the need for notarized signatures, paper, stamps and time lost between mailing. The online portal will also have a status board which will refrain applicants from requesting frequent updates from the PUC, therefore saving the PUC time and money while staying organized.
4. Required Documentation: Per the Staff recommendations and current incentive program, it's noted "Proof that commercial customer of a provider of electricity" needs to be submitted with the Step 1 application. Sometimes there is a gray area we would like to see this requirement and possible exceptions more clearly notated. (EG: Farms with residential meters but are a business; Multifamily residence of 3 units or greater with residential meters; Small Businesses located at the same address as the residential home with a residential meter.) We request more clarity in the terms and

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conditions for the C&I incentive so we can properly educate landlords, farmers and small business owners of what incentives they indeed will qualify for.

5. Technical Requirements: The incentive for solar electric systems is calculated by the nameplate capacity of the system in DC (direct current). We agree with keeping the staff recommendations as it allows for a one to easily estimate the projected incentive and streamline the applicant process. There was no mention in the Staff Recommendations for the program changes for solar thermal. We would like to recommend the solar thermal incentive calculation is revised so it is just as simple to estimate without the time spent between the PUC and installer calculating differing modeling, shading analysis and derate chart results. We suggest modifying the solar thermal incentive to be calculated off of the kBtu Per Year from the SRCC Mildly Cloudy C Rating, eliminating the derating schedule and modeled annual production for the incentive calculation.

Thank you for your time and considerations. Please don't hesitate to contact me at the number or email below if you have questions.

Kind regards,

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